

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

SARAH ZITO; ALVARO SARMIENTO, JR.;  
MARK SHINN; and DANIEL BERMUDEZ, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

STRATA EQUITY GROUP, INC. n/k/a STRATA  
EQUITY GLOBAL, INC.; STRATA AUDUBON,  
LLC; STRATA VERIDIAN, LLC; PINNACLE  
PROPERTY MANAGEMENT SERVICES, LLC;  
WENDI DAMI-VAZQUEZ; JACINTA  
WILLIAMS; and CONSERVICE, LLC,

Defendants.

) Civil Action No.: 2:20-cv-3808-MBS

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**DEFENDANT PINNACLE PROPERTY  
MANAGEMENT SERVICES, LLC'S  
CONSENT MOTION FOR  
ENLARGEMENT OF TIME TO  
RESPOND TO PLAINTIFFS'  
COMPLAINT**

Defendant Pinnacle Property Management Services, LLC ("Defendant"), with the consent of Plaintiffs, hereby files this Motion for Enlargement of Time to respond to Plaintiffs' Complaint.

In support of the Motion, Defendant states as follows:

1. Plaintiffs filed a Summons and Complaint on September 22, 2020 in the South Carolina Court of Common Pleas, Berkeley County.
2. Defendant Pinnacle Property Management Services, LLC was served with the Summons and Complaint on September 30, 2020.
3. On October 29, 2020, the matter was removed to the United States District Court for the District of South Carolina, Charleston Division.
4. Without an agreed-upon extension, the deadline to respond to the Complaint would be November 5, 2020.

5. However, on October 23, 2020, before the case was removed, counsel for Defendant contacted counsel for Plaintiffs via e-mail to request a 30-day extension of time until November 30, 2020, to respond to Plaintiffs' Complaint, in order to give Defendant sufficient time to evaluate its response.
6. On October 26, 2020, also before the case was removed, Plaintiffs' counsel responded in writing, granting the requested extension, making the deadline to respond November 30, 2020.
7. On November 4, 2020, Plaintiffs' counsel confirmed his consent to the above extension applying in federal court.
8. This is a putative class action raising complex issues of utility law, and Defendant continues to need the agreed-up extension to evaluate its response to the Complaint.
9. Therefore, Defendant hereby moves with Plaintiffs' consent for the agreed-upon extension until November 30, 2020, to respond to the Complaint.
10. The deadline will not affect any other deadlines in this case, as no scheduling order has been issued in this case.

For the foregoing reasons, Defendant respectfully requests that the Court enter an Order providing that Defendant Pinnacle Property Management Services, LLC's response to Plaintiffs' Complaint is due on November 30, 2020.

Dated: November 4, 2020

[SIGNATURES ON FOLLOWING PAGE]

WE SO MOVE:

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WE CONSENT:

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